

July 21, 2022

VIA ECF

Judge Pamela K. Chen
Magistrate Judge Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Kurtz v. Kimberly-Clark Corp., et al.*, No. 1:14-cv-01142-PKC-RML
Notice of Joint Motion to Stay for 30 Days

Dear Judge Chen and Judge Levy:

We write on behalf of plaintiff Dr. D. Joseph Kurtz (“Plaintiff”) and defendant Costco Wholesale Corporation (“Costco,” and collectively, the “Parties”) in the above-referenced action to update the Court on the Parties’ settlement efforts and to jointly move this Court to stay all case deadlines in the above-captioned action for thirty (30) days.¹ The Parties continue to make progress toward reaching a settlement that, together with the proposed settlement between Plaintiff and Kimberly-Clark Corporation, would resolve this matter in its entirety, and are cautiously confident that they will finalize an agreement in principle within the requested timeframe. The parties intend to continue to work expeditiously on settlement efforts and will update the Court if and when an agreement in principle is reached.

Respectfully submitted,

/s/ Vincent M. Serra

Vincent M. Serra
Counsel for Plaintiff

/s/ Karl A. Bekeny

Karl A. Bekeny
Counsel for Costco Wholesale Corporation

cc: All Counsel of Record (via ECF)

¹ The operative discovery and dispositive motions deadlines are docketed at ECF No. 440.